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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1 1 CONGRESS STREET, SUITE 1100 BOSTON, MASSACHUSETTS 02114-2023

October 19, 2001

James Shafer, Remedial Project Manager U.S. Department of the Navy Naval Facilities Engineering Command Northern Division 10 Industrial Highway Code 1823, Mail Stop 82 Lester, PA 19113-2090

Re: Draft Final Remedial Action Report for Various Removal Actions at the Derecktor Shipyard and Miscellaneous Investigations at the Naval Station Newport in Newport, RI

Dear Mr. Shafer:

Thank you for the opportunity to review of the *Draft Final Remedial Action Report for Various Removal Actions at the Derecktor Shipyard and Miscellaneous Investigation at the Naval Station Newport*, dated October 2001. EPA reviewed this report in light of the responses to EPA comments on the April 2001 Draft Remedial Action Report and checked whether the October 2001 Draft Final Remedial Action Report incorporated the resulting modifications. Items requiring additional clarification are provided in Attachment A. The responses to these comments may be provided as errata, thereby eliminating the need for a further revision.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Derecktor Shipyard. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymberlee Keckler, Remedial Project Manager

Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Melissa Griffin, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA
Mary Philcox, URI, Portsmouth, RI
David Egan, TAG recipient, East Greenwich, RI

ATTACHMENT A

Page	Comment
p. 5, §I.G	The fifth bullet on the page indicates that "high concentrations of semivolatile compounds and butyltin compounds were detected in the soils under Building 42, apparently due to past discharges from sumps within the building." Please comment on why confirmatory and investigatory samples associated with the two Building 42 sumps addressed in this group of removal actions were not tested for butyltin compounds.
p. 10, §III.A.4	The last paragraph in this section indicates that a screening procedure was instituted for stockpiled soil removed from the berm. Please discuss any additional testing that these piles may have been subjected to beyond the lead and arsenic analyses that were performed on all stockpile samples. Since the screening performed was based on FID readings and visual observations, it is likely that any contamination that would have lead to segregation would have been because of something other than lead or arsenic (<i>i.e.</i> likely some type of organic contamination). If no additional testing was performed on these stockpiles, it is unclear why they were segregated. Please clarify.
p. 12, §III.A.6	The second paragraph in this section discusses the disposal of the "concrete with staining or black mastic material on it." Please indicate what testing, if any, was performed on this material.
p. 12, §III.A.7	The last sentence in this section appears to be incorrectly worded. Please review and confirm as necessary.
p. 12, §III.A.8	The first sentence in this section starts: "As discussed, in Section B" The section referenced appears erroneous. The correct section seems to be III.A.5. Please revise as necessary.
p. 13, §III.A.11	It is not clear whether confirmatory soil samples were collected following berm removal. Please clarify.
p. 29, §III.D.6	The third sentence of the third paragraph appears to reference the wrong Table. Please revise as necessary.
p. 33, §III.E.6	The third paragraph appears to contain incorrect wording: "use of Figure 13." Please review and indicate the intended wording.
Appendix A	This appendix only includes data associated with the first two stockpiles removed from each of the six berm areas. It does not seem to include the lead and arsenic data that were generated for the remaining stockpiles. Please supply the raw data and a summary table for these samples.